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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DOLLY STODDART,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

)
) Case No. 2:22-cv-01119-DJA
)

) **STIPULATION TO VOLUNTARY**
) **REMAND PURSUANT TO SENTENCE**
) **FOUR OF 42 U.S.C. § 405(g) AND TO**
) **ENTRY OF JUDGMENT FOR**
) **PLAINTIFF**
)
)
)
)

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, and with the approval of the Court, that this action be remanded for further administrative action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.

On remand, the Social Security Appeals Council will remand the case to an administrative law judge (ALJ) to take the appropriate actions needed to issue a new decision, including:

- Reevaluate the medical opinions in the record, including the opinion of Kevin Dunsmoor, M.D.;

- Continue with the sequential evaluation, including obtaining vocational expert testimony and clarifying whether any apparent conflict exists between the testimony and information in the DOT; and
- Update the record, offer the claimant the opportunity to a new hearing, and issue a new decision.

The parties further request that the Clerk of the Court be directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

Dated: March 9, 2023

Respectfully submitted,

/s/ Marc V. Kalagian
MARC V. KALAGIAN
(*as authorized via email on March 9, 2023)
Attorney for Plaintiff

Dated: March 9, 2023

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/ Ryan Lu
RYAN LU
Special Assistant United States Attorney
Attorneys for Defendant

IT IS SO ORDERED:



HON. DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: March 10, 2023

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** to be served upon the following by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 9, 2023

/s/ Ryan Lu
RYAN LU
Special Assistant United States Attorney